

Louis T. DeLucia, Esq.
Alyson M. Fiedler, Esq.
SCHIFF HARDIN LLP
666 Fifth Avenue, 17th Floor
New York, NY 10103
T: 212.753.5000
F: 212.753.5044

Alexander G. Benisatto, Esq.
SHAPIRO, CROLAND, REISER
APFEL & DI IORIO, LLP
411 Hackensack Avenue, 6th Floor
Hackensack, NJ 07601
T: 201.488.3900
F: 201.488.9481

*Attorneys for Plaintiff,
MFC Capital Funding, Inc.*

In re:
WRS HOLDINGS, LLC, et al.,

Debtors.

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Chapter 7

MFC CAPITAL FUNDING, INC. a Minnesota
corporation,

Plaintiff,

vs.

VALOR EQUITY PARTNERS, VWR
HOLDINGS, LLC, VALOR MANAGEMENT
CORPORATION, WRS HOLDINGS, LLC,
WRS, LLC, WOODS RESTORATION
SERVICES OF MONTCLAIR, NJ, LLC,
WOODS RESTORATION SERVICES, LLC,
WOODS RESTORATION SERVICES OF
S.C., LLC, ENVIRONMENTAL
REMEDATION CONCEPTS, LLC, WRS,
INC., ROBERT WASIELEWSKI, ANTONIO
GRACIAS, BRADLEY SHEFTEL,
JONATHAN SHULKIN, CHESTER R.
DUNICAN, NELSON SUN, ABC
COMPANIES 1-10, JOHN DOE 1-10 and
JANE DOE 1-10 (fictitiously named individuals
and entities),

Defendants.

Case No. 10-28457 (DHS)

Adv. Pro. No. 12-01137 (JLL)

**STIPULATION AS TO BRIEFING
SCHEDULE FOR DEFENDANTS'
MOTIONS TO DISMISS**

WHEREAS, on February 9, 2012, plaintiff MFC Capital Funding, Inc. (“Plaintiff”), filed its complaint (the “Complaint”) against, among others, Valor Equity Partners, VWR Holdings, LLC, Valor Management Corporation, Robert Wasielewski, Antonio Gracias, Bradley Sheftel, Jonathan Shulkin and Chester R. Dunican (the “Moving Defendants”);

WHEREAS, pursuant to a Stipulation Extending Time for Defendants to Answer, Move or Otherwise Respond to the Complaint and Setting Briefing Schedule filed with the Court on April 4, 2012 [Docket No. 3], the Moving Defendants’ time to respond to the Complaint was extended and a schedule for briefing as to motions to dismiss was set (the “First Stipulation”);

WHEREAS, on April 27, 2012, the Moving Defendants, through their respective counsel, filed three (3) motions to dismiss the Complaint (collectively, the “Motions”); and


WHEREAS, pursuant to a Stipulation, Plaintiff was to file and serve opposition to the Motions on or before June 4, 2012 and the Moving Defendants were to file and serve any reply papers on or before June 18, 2012;

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel to this action that Plaintiff shall file and serve its opposition to the Motions on or before June 11, 2012;

IT IS FURTHER STIPULATED AND AGREED that the Moving Defendants shall file and serve their reply papers on or before June 25, 2012; and

IT IS FURTHER STIPULATED AND AGREED that oral argument on the Motions will be conducted on a date to be designated by the Court.

SCHIFF HARDIN LLP
666 Fifth Avenue, 17th Floor
New York, NY 10103
Attorneys for Plaintiff, MFC Capital Funding, Inc.

By: 

Louis T. DeLucia, Esq.

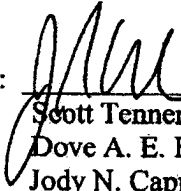
WILSON ELSEER MOSKOWITZ EDELMAN
& DICKER, LLP
200 Campus Drive
Florham Park, NJ 07932
Attorneys for Defendant Robert Wasielewski

By: _____
John P. O'Toole, Esq.
Loren S. Cohen, Esq.

GIBBONS, P.C.
One Gateway Center
Newark, NJ 07102
Attorneys for Defendants Valor Equity Partners, VWR Holdings, LLC, Valor Management Corporation, Antonio Gracias, Bradley Sheftel, and Jonathan Shulkin

By: _____
Dale E. Barney, Esq.

WINGET, SPADAFORA &
SCHWARTZBERG, LLP
46 Broadway, 19th Floor
New York, NY 10006
Attorneys for Defendant Chester R. Dunican

By: 

Scott Tennenbaum, Esq.
Dove A. E. Burns, Esq.
Jody N. Cappello, Esq.

CH2\11378568.1

IT IS FURTHER STIPULATED AND AGREED that oral argument on the Motions will be conducted on a date to be designated by the Court.

SCHIFF HARDIN LLP
666 Fifth Avenue, 17th Floor
New York, NY 10103
Attorneys for Plaintiff, MFC Capital Funding, Inc.

By: _____
Louis T. DeLucia, Esq.

WILSON ELSEER MOSKOWITZ EDELMAN
& DICKER, LLP
200 Campus Drive
Florham Park, NJ 07932
Attorneys for Defendant Robert Wasielewski

By: _____
John P. O'Toole, Esq.
Loren S. Cohen, Esq.

GIBBONS, P.C.
One Gateway Center
Newark, NJ 07102
Attorneys for Defendants Valor Equity Partners, VWR Holdings, LLC, Valor Management Corporation, Antonio Gracias, Bradley Sheftel, and Jonathan Shulkin

By: _____
Dale E. Barney, Esq.

WINGET, SPADAFORA &
SCHWARTZBERG, LLP
46 Broadway, 19th Floor
New York, NY 10006
Attorneys for Defendant Chester R. Dunican

By: _____
Scott Tennenbaum, Esq.
Dove A. E. Burns, Esq.

CH2\11378568.1

IT IS FURTHER STIPULATED AND AGREED that oral argument on the Motions will be conducted on a date to be designated by the Court.

SCHIFF HARDIN LLP
666 Fifth Avenue, 17th Floor
New York, NY 10103
Attorneys for Plaintiff, MFC Capital Funding, Inc.


GIBBONS, P.C.
One Gateway Center
Newark, NJ 07102
Attorneys for Defendants Valor Equity Partners, VWR Holdings, LLC, Valor Management Corporation, Antonio Gracias, Bradley Sheftel, and Jonathan Shulkin

By: _____
Louis T. DeLucia, Esq.

By: _____
Dale E. Barney, Esq.

WILSON ELSEER MOSKOWITZ EDELMAN & DICKER, LLP
200 Campus Drive
Florham Park, NJ 07932
Attorneys for Defendant Robert Wasielewski

WINGET, SPADAFORA & SCHWARTZBERG, LLP
46 Broadway, 19th Floor
New York, NY 10006
Attorneys for Defendant Chester R. Dunican

By:  _____
John P. O'Toole, Esq.
Loren S. Cohen, Esq.

By: _____
Scott Tennenbaum, Esq.
Dove A. E. Burns, Esq.

CH2\11378568.1